

PUBLIC DISCLOSURE

April 7, 2014

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Lee Bank

Certificate Number: 33645

**75 Park Street
Lee, Massachusetts 01238**

**Federal Deposit Insurance Corporation
350 Fifth Avenue, Suite 1200
New York, New York 10118**

**Division of Banks
1000 Washington Street
Boston, Massachusetts 02118**

NOTE: This document is an evaluation of the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operations of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the Division of Banks or the Federal Deposit Insurance Corporation concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

General Information.....	1
Institution’s CRA Rating.....	1
Scope of Evaluation.....	2
Description of Institution.....	3
Description of Assessment Area	3
Conclusions with Respect to Performance Criteria	6
Appendix A – Division of Banks Minority Application Flow	A-1

GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires the Massachusetts Division of Banks (Division) and the Federal Deposit Insurance Corporation (FDIC) to use their authority when examining financial institutions subject to their supervision, to assess the institution's record of meeting the credit needs of its community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agencies must prepare a written evaluation of the institution's record of meeting the credit needs of its assessment area.

This document is an evaluation of the CRA performance of **Lee Bank (or the Bank)**, prepared by the Division and the FDIC, the institution's supervisory agencies, as of **April 7, 2014**. The agencies evaluate performance in the assessment area (AA) defined by the institution, rather than individual branches. This assessment area evaluation may include visits to some, but not necessarily all of the institution's branches. The Division and FDIC rate the CRA performance of an institution consistent with the provisions set forth in 209 CMR 46.00 et seq. and in Appendix A to 12 CFR Part 345 of the FDIC's Rules and Regulations.

INSTITUTION'S CRA RATING: Satisfactory

An institution in this category has an adequate record of helping to meet the credit needs of its AA, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities. Lee Bank's overall CRA performance is "Satisfactory" based on the following conclusions.

- The average net loan-to-deposit (LTD) ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs.
- A majority of loans are in the institution's assessment area.
- The distribution of loans by borrowers' income reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- Lee Bank did not receive any CRA-related complaints during the evaluation period; therefore, this factor did not bear any weight in assigning the overall rating.

SCOPE OF EVALUATION

FDIC and Division examiners evaluated Lee Bank's CRA performance using Small Bank Examination Procedures. These procedures evaluate the institution's lending performance based on the following Lending Test criteria: LTD ratio, assessment area concentration, borrower profile, geographic distribution, and the institution's responsiveness to CRA-related complaints. As the Bank has not received any CRA-related complaints, this performance criterion did not impact the overall rating. The CRA evaluation consists of activity since the Bank's prior CRA evaluation dated May 17, 2011.

Loans reported pursuant to the Home Mortgage Disclosure Act (HMDA) during 2012 and 2013 and small business loans sampled from 2013 were analyzed in this evaluation. Residential loans comprise the largest portion of Lee Bank's loan portfolio, followed by commercial loans; therefore, this evaluation focuses on residential and small business lending, with more weight assigned to residential lending when arriving at overall conclusions. Lee Bank did not make any small farm loans during the evaluation period, and consumer lending accounts for only a small portion of overall lending activity; neither is included in the analysis. Finally, with the exception of the *Assessment Area Concentration* criterion, the tables in the evaluation do not include the total dollar amounts of loans, focusing on lending performance by the number of loans originated during the review period.

Information regarding residential lending is from the Loan Application Registers (LARs) maintained by the Bank for HMDA. The LARs contain data about home purchases and home improvement loans, including refinancings of one-to-four family and multi-family (five or more units) properties. Information about Lee Bank's small business loans came from a sample of 29 loans from the 104 the Bank originated during 2013. Small business loans include commercial real estate loans and commercial and industrial loans with original balances of \$1 million or less. Banks with total assets of \$1.186 billion or less as of December 31st of the prior two consecutive calendar years are not required to report small business loan data.

The tables in the evaluation contain aggregate lending data and demographic information for comparison purposes. The aggregate data includes lending information from all HMDA-reporting lenders that originated loans in the AA; 2012 is the latest year for which aggregate lending data is available. Consumer demographic information referenced comes from the 2010 United States (U.S.) Census, and small business demographic information comes from Dun and Bradstreet.

Management requested that examiners review Lee Bank's performance in making qualified investments and providing services that enhance credit availability in the AA. These efforts support the overall rating assigned.

PERFORMANCE CONTEXT

Description of Institution

Established in 1852, Lee Bank is a state-chartered, stock-owned bank headquartered in Lee, Massachusetts. The Bank is a subsidiary of Berkshire Financial Services, Inc. This parent company has assets of approximately \$45.1 million and owns another financial institution, Freedom National Bank. Lee Bank offers a variety of products and services including residential and commercial loan products; safe-deposit boxes; night depository; online banking; mobile banking; checking, savings, and money-market accounts; and consumer certificates of deposit. The main office is located at 75 Park Street in Lee, with additional branch offices in Great Barrington, Lenox (opened in 2013), Pittsfield (opened in 2012), and Stockbridge. The office in Pittsfield is in a low-income tract, with the remainder of branches in middle- or upper-income tracts. All of the offices are located within Berkshire County of the Pittsfield, Massachusetts Metropolitan Statistical Area (MSA).

As of December 31, 2013, total assets were \$280.5 million, total deposits were \$202.3 million, and total loans were \$232.1 million. Total assets increased 5.7 percent since the prior CRA evaluation, total loans increased 5.0 percent, and deposits increased 16.0 percent. Table 1 details the composition of the loan portfolio.

Table 1 – Loan Portfolio Distribution as of December 31, 2013		
Loan Type	Dollar Amount \$('000s)	Percent of Total Loans*
Construction, Land Development, and Other Land Loans	4,483	1.9
Revolving, Open-end Loans Secured by 1-4 Family Residential Properties and Extended Under Lines of Credit	45,406	19.6
Closed-end Loans Secured by 1-4 Family Residential Properties: Secured by 1st Liens	88,506	38.3
Closed-end Loans Secured by 1-4 Family Residential Properties: Secured by Jr. Liens	1,852	0.8
Secured by Multi-Family (5 or more) Residential Properties	4,977	2.2
Total Residential Real Estate Loans (all above less construction)	140,741	60.8
Secured by Nonfarm Nonresidential Properties	72,090	31.2
Total Real Estate Loans	217,314	93.9
Commercial and Industrial	13,001	5.6
Consumer Loans	1,006	0.4
Total Loans	231,321	100.0

Source: December 31, 2013 Call Report; *rounding errors may occur

As shown in Table 1, Lee Bank's loan portfolio is composed primarily of residential real estate loans, which accounts for the largest loan distribution at 60.8 percent.

The Division and the FDIC last evaluated Lee Bank's CRA performance on May 17, 2011, and assigned an overall rating of "Satisfactory." There are currently no financial or legal impediments that would inhibit the bank from meeting its CRA obligations.

Description of Assessment Area

CRA requires financial institutions to define an assessment area within which the bank will concentrate its CRA activity and lending efforts. The Division and the FDIC evaluate the

institution's CRA performance based on the defined AA. Lee Bank's AA meets the technical requirements of the CRA regulation as it consists of one or more political subdivisions; it includes the geographies where the bank has its main office, branches, and deposit-taking automated teller machines (ATMs), as well as the surrounding geographies in which the institution originated a substantial portion of its loans; it consists of whole census tracts; it does not extend beyond state boundaries; it does not reflect illegal discrimination; and it does not arbitrarily exclude low- and moderate-income areas.

Lee Bank's AA includes the Cities and Towns of Alford, Becket, Egremont, Great Barrington, Hancock, Hinsdale, Lee, Lenox, Monterey, Mt. Washington, New Ashford, New Marlboro, Otis, Pittsfield, Richmond, Sandisfield, Sheffield, Stockbridge, Tyringham, Washington, and West Stockbridge. All of the towns are located in the Pittsfield, Massachusetts MSA. Table 2 contains pertinent demographic information about the AA.

Table 2 – 2013 Assessment Area Demographic Information					
Demographic Characteristics	#	Low	Moderate	Middle	Upper
		% of #	% of #	% of #	% of #
Geographies (Census Tracts)	24	4.2	8.3	70.8	16.7
Population by Geography	83,298	4.1	10.3	69.3	16.4
Owner-Occupied Housing by Geography	24,664	1.0	4.8	74.5	19.7
Businesses by Geography (2013)	8,609	10.6	6.7	65.0	17.7
Distribution of Families by Income	21,221	22.0	16.8	21.9	39.3
Median Family Income (MFI)		\$64,783	Median Housing Value		\$245,037
FFIEC Adjusted MFI		\$56,400	Unemployment Rate		7.9%
Families Below Poverty Level		8.6%			

Source: 2010 U.S. Census demographics, 2013 Federal Financial Institutions Examination Council (FFIEC) updated MFI, 2013 Dun and Bradstreet business demographics, and 2014 Bureau of Labor Statistics for Pittsfield, MA MSA

Population

As shown in Table 2, while the population is concentrated primarily in the middle-income tracts, over one-third of families in the AA are low- or moderate-income. Additionally, nearly nine percent of families have incomes below the poverty line. This is a good indicator for predicting a limited ability to obtain a mortgage loan, which reduces Lee Bank's opportunity to make loans to low-income borrowers.

Housing

There are 46,516 housing units in the AA, of which 53.0 percent are owner-occupied, 24.9 percent are occupied rental units, and 22.1 percent are vacant. The high vacancy rate is due to the large number of vacation homes in the area. The median housing value is \$245,037, which is reasonable given the concentration of housing units in middle and upper income census tracts. The median housing values in low- and moderate- income tracts are \$125,500 and \$111,975, respectively.

Competition

Lee Bank faces competition for residential and commercial loans from regional and national banks, mortgage and finance companies, savings and loan associations, and credit unions operating within the assessment area. In 2012, Lee Bank ranked 2nd out of the 151 financial institutions that reported one or more residential loans in the AA, with a market share of 16.6 percent. The only institution with a higher market share percentage was Greylock Federal Credit Union.

Economic Information

Pittsfield, which is the major urban center in the AA, is the largest City in Berkshire County. The area is largely based on tourism and leisure, with the largest concentration of employment in the service and retail sectors. According to Bureau of Labor Statistics, the seasonally adjusted unemployment rate in Massachusetts at the end of February 2014 was 6.5 percent, compared to a rate of 7.9 percent for the Pittsfield MSA. Additionally, Moody's Analytics stated that the unemployment rate has decreased from the highs in previous years because of people exiting the workforce rather than by job gains. Moreover, high energy costs and a declining labor force have presented challenges to the local economy. Finally, there have been some new projects started in the MSA, which has helped to create temporary construction jobs and future permanent employment opportunities.

Businesses

According to 2013 *Dun & Bradstreet* data, the three leading industries in the AA were services, retail trade, and non-classifiable establishments. In total, there are 8,609 non-farm businesses within the AA. Approximately 71.2 percent of businesses in the AA are small businesses, with gross annual revenues (GARs) of \$1.0 million or less.

Community Contact

As part of the evaluation process, examiners interview contacts within the community to assist in assessing the banking needs of the community. Relevant information obtained from such sources helps to determine whether local financial institutions are responsive to the credit and community development needs of their communities and what further opportunities, if any, are available. During this evaluation, examiners interviewed one contact in the local community. The contact indicated that local financial institutions maintain collegial relationships with business leaders in the community and appear to be aware and engaged in improving the community. The contact also stated that while banks have done a good job in helping the local community, there are still opportunities for affordable housing, revitalization projects, and economic development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Loan-to Deposit Ratio

One area in which an institution can service the credit needs of its community is by making loans to members of that community. For the most part, customer deposits maintained by the institution fund loans made to borrowers. A measurement of how well an institution makes loans in relation to the amount of deposits held is the average net LTD ratio. Lee Bank's LTD ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs.

Table 3 displays the average net LTD ratio for the review period, and compares the Bank to three comparable institutions within the regional area. The ratio was calculated from the 11 quarterly Uniform Bank Performance Reports issued since the previous evaluation in May 2011.

Table 3 – Peer Group Loan-to-Deposit Comparison		
Bank Name	Total Assets \$(‘000s)	Average Net LTD Ratio
		06/30/11-12/31/13
Lee Bank	280,500	118.8%
Adams Community Bank	405,776	97.9%
The Pittsfield Co-operative Bank	252,848	92.4%
Greenfield Co-operative Bank	333,119	70.3%

Source: June 30, 2011 - December 31, 2013 Call Reports

The average net LTD ratio was more than reasonable based on a comparison to banks that were considered similarly-situated (having similar loan composition, assets less than \$450 million, and operate in the regional trade area). The Bank had the highest ratio among this group during the review period. The average net LTD ratios of these institutions ranged between 70.3 percent and 97.9 percent.

Overall, the average net LTD ratio of 118.8 percent is more than reasonable given the available lending opportunities and competition. It ranged from a high of 125.8 percent on June 30, 2011, to the current low of 118.8 percent. While the ratio has declined since the last evaluation, this is understandable in light of the economic conditions. According to management, the declining trend is primarily due to people saving and increasing deposits because of economic uncertainty, combined with declining loan volume. Due to these reasons, deposits grew at a rate of 15.8 percent, while loans grew at 3.8 percent.

Assessment Area Concentration

This performance criterion evaluates whether the institution is primarily lending within its AA. A majority of the lending activity occurs in the AA. During the review period, Lee Bank originated 82.3 percent of loans, by number, and 82.9 percent of loans, by dollar volume, within the AA. Table 4 displays the distribution of the loans originated inside and outside the Bank's AA during the review period.

Table 4 – Distribution of Loans Inside and Outside of Assessment Area										
Loan Category or Type	Number of Loans					Dollar Volume				
	Inside		Outside		Total	Inside		Outside		Total \$(000s)
	#	%	#	%		\$(000s)	%	\$(000s)	%	
Home Loans										
2012										
Home Purchase	95	81.9	21	18.1	116	19,101	83.3	3,838	16.7	22,939
Refinance	377	84.9	67	15.1	444	75,506	85.2	13,095	14.8	88,601
Home Improvement	38	79.2	10	20.8	48	9,196	88.7	1,166	11.3	10,362
Total	510	83.9	98	16.1	608	103,803	85.2	18,099	14.8	121,902
2013										
Home Purchase	126	73.3	46	26.7	172	29,175	76.3	9,042	23.7	38,217
Refinance	231	82.8	48	17.2	279	43,325	81.6	9,762	18.4	53,087
Home Improvement	30	85.7	5	14.3	35	6,596	86.3	1,051	13.7	7,647
Total	387	79.6	99	20.4	486	79,096	79.9	19,855	20.1	98,951
Total Home Loan	897	82.0	197	18.0	1,094	182,899	82.8	37,954	17.2	220,853
Small Business Loans										
Total 2013	27	93.1	2	6.9	29	3,273	90.4	346	9.6	3,619
Grand Total	924	82.3	199	17.7	1,123	186,172	82.9	38,300	17.1	224,472

Source: HMDA LARs for 2012 and 2013 and Bank Records – Small Business Loan Data (2013).

Residential Loans

The majority of loans originated during 2012 and 2013 were in the AA. Originations decreased from 2012 to 2013, which was primarily attributable to the low interest rate environment in 2012 and borrowers seeking to lock into historically low mortgage rates. Home purchase loans increased in 2013 both inside and outside the AA.

Small Business Loans

As previously mentioned, Lee Bank is not required to report its small business lending activity; therefore, conclusions are based on a sample of 29 small business loans originated during 2013. Table 4 shows the substantial majority of small business loans originated in 2013 were in Lee Bank's AA.

Borrower Profile

The distribution of loans by borrower income level and business revenues helps to determine Lee Bank's level of addressing the credit needs of the area's residents and businesses, with emphasis on low- and moderate-income residents and businesses with GARs of \$1 million or less. The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes. The following sections discuss Lee Bank's performance under this criterion.

Residential Loans

Table 5 shows the distribution of residential mortgages by borrower income level. For comparative purposes, Table 5 also shows 2012 aggregate data and the distribution of AA families by income level. Lee Bank achieved a reasonable penetration of home loans among borrowers of different incomes.

Table 5 – Distribution of Home Mortgage Loans by Borrower Income Level						
Income Level	% of Total Families	2012 Aggregate Lending Data	Bank 2012		Bank 2013	
		(% of #)	#	%	#	%
Low	22.0	6.7	23	4.5	10	2.6
Moderate	16.8	17.9	65	12.7	29	7.5
Middle	21.9	21.7	101	19.8	63	16.3
Upper	39.3	48.7	308	60.4	274	70.8
N/A	0.0	5.0	13	2.6	11	2.8
Total	100.0	100.0	510	100.0	387	100.0

Source: 2012 & 2013 HMDA LAR; 2010 U.S. Census Data

In 2012, lending to low-income families within the AA was less than aggregate data and the percentage of low-income families. Although the Bank's percentage was less than aggregate data, market ranks indicate the Bank was active in making loans to low-income borrowers. According to 2012 market share data, Lee Bank ranked 2nd and captured 11.8 percent of the market in lending to low-income borrowers. Additionally, nearly 9.0 percent of families in the AA are below the poverty line, which reduces the opportunity for lending to low-income individuals.

Lending to moderate-income families was also less than aggregate data and the percentage of moderate-income families in the AA. Lee Bank ranked 3rd in lending to moderate-income families in the area and captured 12.4 percent of the market.

While Lee Bank's lending performance was less than the aggregate for both low- and moderate-income borrowers, the Bank ranked 2nd and 3rd respectively in lending to these borrowers. These facts illustrate Lee Bank's efforts to make home loans available to families of all income levels.

In 2013, the percentage of home loans to low- and moderate-income borrowers decreased significantly from 2012 lending levels. This trend is mainly attributable to the increase in interest rates from 2012 to 2013.

Small Business Loans

Table 6 provides information regarding the distribution of small business loans by GARs as compared to business demographic data. Overall, the distribution of small business loans reflects reasonable penetration to businesses with GARs of \$1 million or less.

Table 6 – Distribution of Small Business Loans by Business Revenue Category			
GARs \$(000s)	% of Total Businesses (2013)	Bank 2013	
		#	%
≤ \$1,000	71.2	17	63.0
> \$1,000	5.2	10	37.0
Not Reported	23.6	0	0.0
Total	100.0	27	100.0

Source: Bank Records – Small Business Loan Data (2013); D&B 2012 Business Data.

As illustrated in Table 6, 2013 small business lending performance was lower than the business demographic indicator. Lee Bank's performance was not compared to aggregate lending performance, as the Bank is not required to report small business data. Although Bank performance was less than demographics, a majority of loans were made to small businesses.

Geographic Distribution

The evaluation of the geographic distribution of loans in the AA helps to assess how well the Bank is addressing credit needs throughout all portions of the AA. The geographic distribution of loans reflects reasonable dispersion of residential and small business loans throughout the AA.

Residential Loans

Table 7 illustrates residential loan originations by census tract income level in 2012 and 2013. The Bank's performance was compared to 2012 aggregate lending data and the distribution of owner-occupied housing units within the AA.

Table 7 – Distribution of Home Mortgage Loans by Census Tract Income Level						
Census Tract Income Level	% of Total Owner-Occupied Housing Units	2012 Aggregate Lending Data	Bank 2012		Bank 2013	
		% of #	#	%	#	%
Low	1.0	0.9	4	0.8	2	0.5
Moderate	4.8	3.9	7	1.4	3	0.8
Middle	74.5	74.2	387	75.8	291	75.2
Upper	19.7	21.0	112	22.0	91	23.5
Total	100.0	100.0	510	100.0	387	100.0

Source: 2012 & 2013 HMDA LAR; 2010 U.S. Census Data

In 2012, lending in the low-income tract within the AA is comparable to both aggregate data and the percentage of owner-occupied units in this tract. According to 2012 market share data, financial institutions subject to HMDA reporting originated only 27 loans in the low-income tract. The Bank ranked 3rd and captured 14.8 percent of the market share, which demonstrates its efforts to reach this portion of the AA.

Lending in moderate-income tracts did not meet aggregate data or the percentage of owner-occupied units in these tracts. Lee Bank ranked 4th in lending to moderate-income tracts in the AA, capturing 6.5 percent of the market.

While Lee Bank's lending performance was less than the aggregate in both low- and moderate-income tracts, the Bank ranked 3rd and 4th respectively within these tracts. Moreover, given the high level of competition in the AA from much larger lenders, Lee Bank's performance is reasonable.

In 2013, the Bank's percentage of home loans in low- or moderate-income census tracts decreased from 2012 lending levels, accounting for only 1.3 percent of total loans made in the AA. These decreases are mainly attributable to the increase in interest rates from 2012 to 2013.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the AA. Table 8 summarizes Lee Bank's distribution of small business loans by census tract income level and compares this activity to the distribution of businesses within the AA.

Table 8 – Distribution of Small Business Loans by Census Tract Income Level			
Census Tract Income Level	% of Total Businesses (2013)	Bank 2013	
		#	%
Low	10.6	0	0.0
Moderate	6.7	1	3.7
Middle	65.0	23	85.2
Upper	17.7	3	11.1
Total	100.0	27	100.0

Source: Bank Records – Small Business Loan Data (2013); D&B 2012 Business Data

As illustrated in Table 8, the Bank's lending levels were lower than the business demographic indicator in both low- and moderate-income tracts. While Lee Bank originated only one loan in a moderate-income tract, the Pittsfield market is highly competitive and includes larger institutions such as Berkshire Bank and Greylock Federal Credit Union. Additionally, the Bank is primarily a residential lender.

Response to CRA Complaints

Lee Bank did not receive any CRA-related complaints during the evaluation period; therefore, this performance criterion did not bear any weight in assigning the overall CRA rating.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet credit needs was identified.

APPENDIX A

MINORITY APPLICATION FLOW

Division examiners reviewed the Bank's LARs for 2012 and 2013 to determine if the application flow from the different racial and ethnic groups within the AA was reflective of the AA's demographics.

According to the 2010 U.S. Census Data, the AA contained a total population of 83,298, of which 10.7 percent are minorities. The minority and ethnic population is 3.2 percent Black/African American, 1.2 percent Asian, 0.1 percent American Indian, 0.0 percent Hawaiian/Pacific Islander, 4.1 percent Hispanic or Latino and 2.1 percent other.

For 2012 and 2013, the Bank received 1,337 HMDA reportable loan applications from within its AA. Of these applications, Lee Bank received 44 (3.3 percent) from minority applicants. The Bank also received 29 (2.2 percent) applications from ethnic groups of Hispanic origin within its AA, and originated 13 (44.8 percent).

Division examiners also compared the Bank's 2012 level of lending with that of the aggregate's lending performance levels for the most recent year that data was available. The comparison of this data assists in deriving reasonable expectations for the rate of applications the Bank received from minority residential loan applicants. Refer to the table below for information on the Bank's minority application flow as well as the aggregate lenders in the Bank's AA.

Minority Application Flow					
	Bank 2012		Aggregate Data 2012	Bank 2013	
RACE	#	%	%	#	%
American Indian/ Alaska Native	2	0.3	0.3	2	0.3
Asian	7	0.9	0.8	4	0.7
Black/ African American	0	0.0	1.1	10	1.7
Hawaiian/Pac Isl.	0	0.0	0.1	3	0.5
2 or more Minority	0	0.0	0.0	0	0.0
Joint Race (White/Minority)	11	1.5	1.0	5	0.9
Total Minority	20	2.7	3.3	24	4.1
White	638	85.5	81.9	505	85.4
Race Not Available	88	11.8	14.8	62	10.5
Total	746	100.0	100.0	591	100.0
ETHNICITY					
Hispanic or Latino	7	0.9	1.5	12	2.0
Not Hispanic or Latino	638	85.5	82.4	507	85.8
Joint (Hisp/Lat /Not Hisp/Lat)	4	0.5	0.9	6	1.0
Ethnicity Not Available	97	13.0	15.2	66	11.2
Total	746	100.0	100.0	591	100.0

Source: 2010 US Census Data, 2012 and 2013 HMDA LAR, 2102 HMDA Aggregate Data

The Bank's performance was below the 2012 aggregate's performance level for both racial and ethnic minorities. However, 2013 data shows a significant positive trend. Overall, the Bank's performance is considered reasonable.